

The Honorable Ronald B. Leighton

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WESTERN WASHINGTON
AT SEATTLE**

CALLI L. HISEY, an individual; and **CALLI
HISEY LAW OFFICES PC**, a Washington
corporation,

Plaintiffs,

v.

KELLY ELLIS, an individual; **INNOVATIVE
DATA SEARCH LLC d/b/a**
www.BankruptReport.com, a Delaware company;
ENOM, LLC, a Washington company; **PRIVACY
PROTECTION SERVICE INC. d/b/a**
PrivacyProtect.org; **GOOGLE INC.**, a Delaware
corporation; **YAHOO! INC.**, a Delaware
corporation; **MICROSOFT CORPORATION**, a
Washington corporation; and **JANE DOES** and
JOHN DOES 1-10, inclusive,

Defendants.

Case No. 3:17-cv-05543-RBL

**DECLARATION OF KELLY ELLIS
IN OPPOSITION TO PLAINTIFFS'
MOTION FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

I, KELLY ELLIS, hereby declare as follows:

1. I am one of the defendants in the above-captioned case. I make this declaration based on personal knowledge and belief, and in opposition to Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction.

2. I am also the founder and principal of another defendant in the above-captioned case, Innovative Data Search LLC (“IDS”), a Delaware company that provides aggregate data services. More specifically, IDS modifies aggregate data into a proprietary architecture in the form of an online database—instead of having to search multiple websites databases for particular information, IDS allows its users to search for that information within a single, comprehensive database. I began operating IDS in 2012, and officially formed IDS as a limited liability company (“LLC”) in the State of Delaware on December 12, 2013.
3. Although IDS is a Delaware LLC, I have been a resident of Missouri for the entire time that I have operated IDS. Additionally, I have never visited the State of Washington for any purpose, and IDS has never sold any services to any customers in Washington.
4. IDS maintains an online database at its flagship website, located at www.BankruptReport.com (“BankruptReport.com”). BankruptReport.com aggregates publicly available bankruptcy information into a comprehensive, searchable database; and is intended as a tool for professionals in banking, finance, and related industries. BankruptReport.com currently contains over 14 million pages, and is updated regularly. Any member of the public can access and use BankruptReport.com.
5. IDS maintains a similar online database located at www.ArrestReport.com (“ArrestReport.com”), which aggregates publicly available arrest information into a comprehensive, searchable database; and is intended as a tool for professionals in legal, law enforcement, court bonds, and related industries. ArrestReport.com currently contains information about more than 21 million arrests, and is updated frequently. Any member of the public can access and use ArrestReport.com.
6. IDS’s business model is based on selling targeted advertising and custom aggregate databases to its customers. Specifically, IDS sells advertising space on BankruptReport.com and ArrestReport.com, primarily to business owners and other

professionals. This advertising space provides IDS's customers with a cost-effective alternative to buying advertising space on websites such as Google, Yelp, or Facebook.

7. IDS also sells custom aggregate databases to its customers, through its website located at www.MacroClick.com ("MacroClick.com"). IDS creates these custom databases based on the demographics and geographic locations of each customer's target market. These customers can then post ads on their own custom databases, again at a lower cost per click than they would spend on, say, Google AdWords. This method is known to generate a large amount of web traffic at a much lower cost than through conventional advertising.
8. Additionally, IDS develops smartphone apps. One of these apps is a completely free-to-use and ad-free smartphone app called MugshotSearch, with a website located at www.MugshotSearchEngine.com ("MugshotSearchEngine.com"). Users can download MugshotSearch for use on both Apple and Android platforms. IDS also has other apps in various stages of development—as the company name suggests, IDS is committed to data innovation.
9. Currently, IDS generates nearly all of its revenue through its targeted advertising and custom database creation services, and does not base its business model on the removal of information from BankruptReport.com, ArrestReport.com, MugshotSearchEngine.com, or any other website. IDS has never solicited anyone for information removal services. (IDS does, however, solicit professionals with respect to its advertising services.)
10. Because BankruptReport.com includes over 14 million pages, an individual's name could be on multiple webpages with parent directories that are all interlinked, and could be indexed by any number of search engines. As such, even removing a single record from BankruptReport.com has the potential to corrupt large sections of the database.

1 11. IDS is not legally obligated to remove information from its websites, but it does provide a
2 protocol for information removal, as a courtesy. IDS will comply with reasonable requests
3 to remove information from its websites, and does not charge a fee for this service.

4 12. IDS does, however, charge a nominal fee for the onerous task of removing residual
5 bankruptcy information from search engines. To explain in further detail, even if IDS
6 removes bankruptcy information from BankruptReport.com, any number of search engines
7 may have indexed those pages and the bankruptcy information will still “residually” appear
8 in search results for an individual. I am aware of a Texas law that caps fees for such
9 removal services at \$150, so in taking a cautious approach with respect to fees, IDS
10 charges a maximum fee of \$150 to remove an individual’s residual bankruptcy information
11 from search engines. However, the \$150 fee barely covers the administrative time
12 necessary for the removal, so this is not the source of IDS’s revenues.

13 13. Likewise, IDS uses ArrestReport.com solely to sell advertising space to its customers, and
14 does not charge any fees for removing arrest information from ArrestReport.com.

15 14. It has never been my intention for IDS to make its money through extortion. IDS only puts
16 forth publicly available facts, and is not in the business of taking advantage of others. I
17 started my first online business in 1997, and since then have always taken great care to
18 ensure that my business practices comply with the various Internet laws. It is also
19 important to me that IDS reflects my strong sense of integrity and personal ethics. As one
20 example, my wife and I both strongly advocate for animal welfare, and for years we have
21 donated advertising on BankruptReport.com to the American Society for the Prevention of
22 Cruelty to Animals (“ASPCA”). In short, it would be against my professional and personal
23 ethics to use IDS as an avenue for lies and extortion.

24 15. Despite IDS being in full compliance with the law, several individuals have filed consumer
25 complaints about BankruptReport.com in the past. These complaints have led to
26

1 investigations by the Attorney General's Office of over a dozen states, including the State
2 of Washington. However, all of these investigations have been closed due to zero evidence
3 of BankruptReport.com engaging in unfair or deceptive trade practices. In other words, the
4 Attorney General's Office of over a dozen states have deemed BankruptReport.com's
5 methodology to be completely legal. As an example, a communication from the
6 Washington Attorney General's Office is attached hereto as **Exhibit A**. These findings
7 have reaffirmed my understanding and belief that it is lawful to aggregate publicly
8 available bankruptcy information in online databases. (ArrestReport.com and
9 MugshotSearchEngine.com have never been the subject of any such complaints.) Aside
10 from the occasional consumer complaint, IDS had operated BankruptReport.com from
11 2012 to 2016 without disputes.

12 16. The present conflict arose in December 2016, as evidenced by a string of emails attached
13 hereto as **Exhibit B**. On December 16, 2016, IDS received its first email communication
14 ("First Email") from an attorney named Calli L. Hisey ("Hisey")—one of the plaintiffs in
15 the current action—with the other plaintiff being Hisey's law firm, Calli Hisey Law
16 Offices PC. In her First Email, Hisey demanded that IDS remove her information from
17 BankruptReport.com within five (5) days, or she would explore her legal options. Hisey
18 told IDS to consider her First Email as a "cease and desist." She also mentioned that she
19 was an attorney in an attempt to intimidate IDS into complying with her demands.

20 17. On December 17, 2016, IDS responded to Hisey's First Email with a professional, polite,
21 and informative email, noting that IDS had lawfully published publicly available
22 information to BankruptReport.com, and that IDS was not obligated to remove that
23 information upon her request.
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25
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1 18. On December 19, 2016, Hisey responded to IDS with a second email (“Second Email”), in
2 which she threatened to file a class action lawsuit against IDS if it did not remove her
3 information from BankruptReport.com within ten (10) days.

4 19. Also on December 19, 2016, IDS responded to Hisey’s Second Email with yet another
5 professional, polite, and informative email, noting that IDS has been vetted by the Attorney
6 General’s Offices of many states. IDS also noted that it was aware of its First Amendment
7 and other legal rights, that it would not be bullied by her, and that Hisey did not have to
8 wait the ten (10) days to file an action against IDS.

9 20. On December 20, 2016, Hisey responded to IDS with a third email (“Third Email”), in
10 which she demanded the answers to a slew of questions about IDS, IDS’s business
11 affiliations, and IDS’s understanding of tort and criminal law.

12 21. Also on December 20, 2016, IDS responded to Hisey’s Third Email, telling her it was none
13 of her business. IDS then sent another response, stating that it would file a complaint with
14 the Washington Bar Association.

15 22. Again on December 20, 2016, Hisey responded to IDS with a fourth email (“Fourth
16 Email”), in which Hisey asked IDS to stop emailing her. IDS complied with her request to
17 stop emailing her, and did not respond to Hisey’s Fourth Email.

18 23. Yet again on December 20, 2016, Hisey sent IDS a fifth email (“Fifth Email”), in which
19 Hisey asked IDS to remove her information from BankruptReport.com.

20 24. On December 22, 2016, IDS responded to Hisey’s Fifth Email with another professional,
21 polite, and informative email, noting that IDS was merely honoring Hisey’s request not to
22 contact her, and was possibly willing to discuss the matter if Hisey allowed communication
23 to flow both ways, rather than unidirectionally. Hisey did not respond to this email.

24 25. On December 27, 2016, Hisey submitted a formal consumer complaint to the Better
25 Business Bureau (“BBB Complaint”), even though Hisey was never a client of IDS and
26

1 never contacted IDS as a consumer. IDS had also never solicited Hisey in any capacity.
2 Hisey's BBB Report contained false, defamatory information, using the words "extortion,"
3 "illegal," and "scam" to describe IDS. The BBB Complaint is attached hereto as **Exhibit**
4 **C.**

5 26. On December 27, 2016, after receiving notice of the BBB Complaint, IDS emailed an
6 additional response to Hisey's Fifth Email, telling Hisey she could expect a formal
7 complaint to the State Bar. IDS then emailed another additional response to Hisey's Fifth
8 Email, adding that because of Hisey's BBB Complaint, IDS would never remove her
9 information from BankruptReport.com.

10 27. After IDS's December 27, 2016 emails, Hisey filed a false police report for the purpose of
11 securing an order of protection against IDS, in which Hisey presented emails between IDS
12 and Hisey that were out of order, a timeline of events that was also out of order, and
13 omitted information that would have provided full context regarding the situation.

14 28. It was not until after Hisey's erroneous BBB Complaint and falsified police report that I
15 felt compelled to use the domain name www.CalliHisey.com ("CalliHisey.com") to set
16 forth the context and facts relating to the present dispute between Hisey and IDS. My sole
17 reason for publishing this information on CalliHisey.com was to defend myself and my
18 company from Hisey's defamatory allegations, and to promote truth in the midst of Hisey's
19 lies. I never made any false representations on CalliHisey.com, nor did I attempt to pass off
20 CalliHisey.com as written or endorsed by Hisey herself. I am frustrated by the fact that I
21 even had to create this website to defend IDS from Hisey's lies and attacks.

22 29. After filing the false police report, Hisey sent IDS an additional seven (7) emails—on May
23 9, 2017; May 21, 2017; May 23, 2017; May 24, 2017; May 25, 2017; May 28, 2017; and
24 May 29, 2017. IDS did not respond to any of these emails.

25 30. On July 16, 2017, Hisey commenced the present action.
26

1 31. On July 19, 2017, Hisey started emailing IDS again.

2 32. On August 1, 2017, IDS submitted an offer to Hisey to resolve this dispute, which she did
3 not accept.

4 33. Throughout all of IDS's communications with Hisey, IDS never once demanded any
5 money from Hisey in exchange for removing her information from our websites. IDS
6 merely published public information about Hisey and refused to remove the information
7 because Hisey did not act reasonably when she resorted to unfounded accusations, threats,
8 and bullying. Had Hisey gone through the proper channels in the first place, IDS would
9 have removed her information from BankruptReport.com within 48 hours (as is standard
10 practice when anyone makes a reasonable request for information removal).

11 34. IDS has lost a significant amount of money as a direct result of Hisey's actions and false
12 accusations against IDS. A number of IDS customers have pulled their advertisements off
13 of IDS's two main websites, BankruptReport.com and ArrestReport.com, since this
14 conflict has been evidenced online (starting with the BBB Complaint). For the same
15 reasons, it has been extremely difficult to sell our services to potential new customers, and
16 IDS has stopped soliciting any potential new customers as a result of Hisey's defamatory
17 statements about the company.

18
19 **I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE**
20 **BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS**
21 **MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR**
22 **PERJURY.**

23
24 DATED this 10th day of August 2017.
25
26

By: *s/ Kelly Ellis*

Kelly Ellis

Principal of Innovative Data Search LLC

ATTORNEY CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2017, I have made service of the foregoing DECLARATION OF KELLY ELLIS OPPOSITION TO PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION on the party listed below, by hand delivery.

Calli L. Hisey, WSBA No. 49748
Calli Hisey Law Offices PC
1104 Main Street, Suite 212
Vancouver, WA 98660
Phone: (360) 695-0365
Email: calli@callihiseylawoffices.com

DATED this 10th day of August 2017.

By: *s/Susan Ford*

Susan Ford, WSBA No. 28015
Res Nova Law
1455 NW Irving Street, Suite 200
Portland, OR 97209
Ph: (971) 247-4023
Fax: (971) 339-0401
susan@resnovalaw.com

Attorney for Defendants Kelly Ellis and
Innovative Data Search LLC

Subject: 440457 : A notice from the Washington State Attorney General's Office
Date: 4 Dec 2013 08:05:54 -0800
From: ATG MI Seattle CRC (ATGDBOLYPRD06) <SeaCRC@atg.wa.gov>
Reply-To: SeaCRC@atg.wa.gov
To: admin@bankruptreport.com

Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON
Consumer Protection Division
800 Fifth Avenue, Suite 2000 Seattle, WA 98104 (206) 464-6686

December 4, 2013

Bankruptreport.com

RE: Praveen Rajasekhar
File #: 440457

Dear Bankruptreport.com:

The Consumer Protection Division of the Attorney General's Office received your written response to the consumer complaint filed by Praveen Rajasekhar regarding your business. This concludes our informal complaint resolution process. This consumer complaint has been closed accordingly. We have provided a copy of your response to Praveen Rajasekhar.

Our Office monitors consumer complaints for possible indications of patterns of unfair or deceptive trade practices warranting further attention by our office. We may open a formal investigation or take enforcement action pursuant to the Consumer Protection Act at any time if the facts and circumstances indicate that further action is warranted.

Please note that consumer complaints, including responses, are public records and are available to the public for copying or inspection in compliance with the Washington State Public Records Act, [RCW 42.56](#).

We appreciate your participation in this process.

NATALIYA MUZYKA
Program Coordinator
Consumer Protection Division
(206) 389-3850
Fax: (206) 587-5636
seacrc@atg.wa.gov

EXHIBIT B

[Back](#) www.callihisey.com

Return-Path: <chisey@joshuabeanelaw.com>
 Delivered-To: data@server.editrep.com
 Received: from server.editrep.com
 by server.editrep.com (Dovecot) with LMTP id P+MyMJqYVFhcdgAAy2/a7g
 for <data@server.editrep.com>; Fri, 16 Dec 2016 20:44:59 -0500
 Return-path: <chisey@joshuabeanelaw.com>
 Envelope-to: admin@innovativedatasearch.com
 Delivery-date: Fri, 16 Dec 2016 20:44:59 -0500

Hello,

Please remove me from your website and consider this a cease and desist to posting my information on your website. Please remove the content within 5 days or I will ex
 Thank you.

Calli L. Hisey
 Associate Attorney
 Joshua J. Bean, PLLC
 4001 Main Street, Suite 300
 Vancouver, WA 98663
 P: [360.695.3695](tel:360.695.3695)
 F: [360.347.1446](tel:360.347.1446)
chisey@joshuabeanelaw.com

Response:

Ms. Hisey,

You will find no law prohibiting our publication nor requiring it's removal.

BankruptReport.com and their publishers, reserves the right to publish our public, legally acquired data in the form of an online searchable database. We are not oblig

Please note, we do not need your permission or authorization to publish these public records.

Our website, development architecture, domain name and proprietary search technologies are either private or intellectual properties which affords us the right to our o

The information contained on bankruptreport.com is compiled from computerized data, valid and deemed to be public record. No warranty or guarantee is made or im
 may not reflect updates or corrections of records. User assumes all liability for the display or use of information obtained from this site.

BankruptReport is not a "consumer reporting agency" as defined under the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. Â§ 1681 et seq., as amended, and the inform
 FCRA. Rather, the information provided on BankruptReport.com has been obtained via private purchase by Innovative Data Search.

BankruptReport.com is not intended or expected to be used to (a) establish a consumer's eligibility for personal credit or insurance; (b) assess risks associated with exis
 workers such a nannies, housekeepers, or contractors) or in conjunction with assessing the merits of entering into any other personal business transaction with another

All rights reserved.

Thank you,
 IDS Admin

Return-Path: <chisey@joshuabeanelaw.com>
 Delivered-To: data@server.editrep.com
 Received: from server.editrep.com
 by server.editrep.com (Dovecot) with LMTP id WWu9AfuaWFi4JAAy2/a7g
 for <data@server.editrep.com>; Mon, 19 Dec 2016 21:44:11 -0500
 Return-path: <chisey@joshuabeanelaw.com>
 Envelope-to: sales@innovativedatasearch.com
 Delivery-date: Mon, 19 Dec 2016 21:44:11 -0500

Hello,

The information you are posting is not available for free access to the public. It is accessible via a paid website called Pacer. Therefore, it is not freely available to the p
 my research turn up information and case law to support my position, please be advised I will be contacting the other individuals you are publicly shaming to file a class

In the meantime, please consider this a cease and desist to posting about me on your website. Should you refuse to remove the content within ten (10) days, I will proceed
 face of a class action lawsuit.

Sincerely,

Calli L. Hisey
 Associate Attorney
 Joshua J. Bean, PLLC
 4001 Main Street, Suite 300
 Vancouver, WA 98663
 P: [360.695.3695](tel:360.695.3695)
 F: [360.347.1446](tel:360.347.1446)
chisey@joshuabeanelaw.com

Response:

Calli,

With all due respect, we have been vetted by half of the United States Attorney's General.

Your perception of our service is based in ignorance and clouded by personal interest. The verbiage you used is offensive and will not achieve your goal of 'scaring' us i

Your entitled to your opinion, however there is nothing wrong with our database legally or ethically, and you have not altered our position on that.

Challenging a publisher on the First Amendment is rarely going to achieve your goal, especially if that goal entails "unpublication".

You may forgo the "10 days" cited in your correspondence, as we will not be acquiescing to your request.

Regards,
IDS Admin

Return-Path: <chisey@joshuabeanlaw.com>
Delivered-To: data@server.editrep.com
Received: from server.editrep.com
by server.editrep.com (Dovecot) with LMTP id UTzLFkNwWVgBUQAAY2/a7g
for <data@server.editrep.com>; Tue, 20 Dec 2016 12:54:11 -0500

IDS Admin,

A couple of questions since you are being so responsive:

- 1) What is the purpose of your website?
- 2) Do you receive any financial benefit from your website?
- 3) What is your affiliation to online reputation management companies? Explain.
- 4) Do you receive or remit any financial compensation from or to online reputation management companies? Explain.
- 5) Do you understand the legal concept of Negligent Infliction of Emotional Distress?
- 6) Do you understand that extortion is a federal crime?

Thank you for your prompt replies. It really is refreshing that your company has time to so efficiently respond to complaints, adamantly refusing liability. Have a nice da
Sincerely,

Calli L. Hisey
Associate Attorney
Joshua J. Bean, PLLC
4001 Main Street, Suite 300
Vancouver, WA 98663
P: [360.695.3695](tel:360.695.3695)
F: [360.347.1446](tel:360.347.1446)
chisey@joshuabeanlaw.com

Response:

none of your business!

Additional Response:

this may not end up the way you are thinking, I would tread very carefully if I were you.
I feel like making a website about your ignorance and your veiled threats I believe I will create it so consumers in your area can see how you attempt to bully and abuse
I will now make a complaint to the bar about your correspondence with me. You do not make threats like this without a response.

Return-Path: <chisey@joshuabeanlaw.com>
Delivered-To: data@server.editrep.com
Received: from server.editrep.com
by server.editrep.com (Dovecot) with LMTP id hiSlBSKQWVg4RQAAY2/a7g
for <data@server.editrep.com>; Tue, 20 Dec 2016 15:10:10 -0500

This has spiraled out of control, and is actually beginning to frighten me. Please stop emailing me. I simply asked you to remove my name from your website.

Sincerely,

Calli L. Hisey
Associate Attorney
Joshua J. Bean, PLLC
4001 Main Street, Suite 300
Vancouver, WA 98663
P: [360.695.3695](tel:360.695.3695)
F: [360.347.1446](tel:360.347.1446)
chisey@joshuabeanlaw.com

No Response:

Delivered-To: marcmtree@gmail.com
Received: by 10.50.121.101 with SMTP id lj5csp1683467igb;
Tue, 20 Dec 2016 12:14:19 -0800 (PST)
X-Received: by 10.55.64.79 with SMTP id n76mr1313717qka.178.1482264859054;
Tue, 20 Dec 2016 12:14:19 -0800 (PST)
Return-Path: <chisey@joshuabeanlaw.com>

Please remove the website you have created. I really do not want this to carry on any further. I will not bring a lawsuit, and I will quash this forever. Please do not harm

Calli L. Hisey
Associate Attorney
Joshua J. Bean, PLLC
4001 Main Street, Suite 300
Vancouver, WA 98663
P: [360.695.3695](tel:360.695.3695)
F: [360.347.1446](tel:360.347.1446)
chisey@joshuabeanlaw.com

EXHIBIT B

Response:

Ms. Hisey,

You have requested that we discontinue writing. We have and will respect that request, and are only writing this now as a response to an additional email inquiry from you outside the context of responding to your transmissions.

If you would like to discuss the matter, I will need your explicit permission to write to you, or at the very least respond to your inquiries, and your confirmation that you are not 'scared' for your physical well being in any capacity in association with our correspondence or any of our websites or database.

We are willing to possibly discuss the matter, but will not take any action based on correspondence received in what you have by request reduced to a unidirectional communication.

Please note, that response time may be slow over the holiday.

Regards

Additional Response: (after a BBB complaint claiming illegal activity)

You can count on a formal complaint to the State Bar of California in return.

Additional Response: (after a BBB complaint claiming illegal activity)

You can count on a formal complaint to the State Bar of California in return. nice complaint to the bbb.

If you believe that will HELP you get that removed, you are very ignorant.

We will never remove the website now.

You reaped what you have sewn right from your initial demand.

Happy Holidays.

She then filed an order of protection and sent an additional 7 emails with no response:

Subject: Website

Date: Tue, 9 May 2017 13:43:42 -0700

From: Calli Hisey <hisey.calli@gmail.com>

To: data@innovatedatasearch.com

Hello,

I am contacting you about the website www.callihisey.com that you created in February. I have asked you to take this website down, but you refuse and I'm not sure why.

Calli

Subject: Re: Website

Date: Sun, 21 May 2017 15:01:48 -0700

From: Calli Hisey <hisey.calli@gmail.com>

To: data@innovatedatasearch.com

Hi Kelly,

What can I do to get you to take down the website you created about me?

(She could start by not threatening our existence, threatening us with a class action suit, and making erroneous, unsubstantiated claims about our business)

Subject: Re: Website

Date: Tue, 23 May 2017 09:20:58 -0700

From: Calli Hisey <hisey.calli@gmail.com>

To: data@innovatedatasearch.com

Hi Kelly!

What can I do to get you to remove the website you created about me and return my URL?

Thanks!

EXHIBIT B

(She could APOLOGIZE, admit error, and RETRACT the libelous BBB Review)

Subject:Re: Website

Date:Wed, 24 May 2017 14:45:00 -0700

From:Calli Hisey <hisey.calli@gmail.com>

To:data@innovatedatasearch.com

CC:admin@aiminvestigations.com

Hi Kelly!!

What can I do today to get you to remove the website you created about me? And also to return the URL you are holding that is my name? Thanks, look so forward to hea

Calli

(Obviously attempting to goad the recipient whom she believes has been served an order of protection)

Subject:Re: Website

Date:Thu, 25 May 2017 06:00:44 -0700

From:Calli Hisey <hisey.calli@gmail.com>

To:data@innovatedatasearch.com

CC:admin@aiminvestigations.com

Good morning Kelly Ellis!

What can I do to get you to remove the website you created about me in December, using my name for the URL?

All the best!

Calli

Subject:callihisey.com

Date:Sun, 28 May 2017 12:22:50 -0600

From:Calli Hisey <hisey.calli@gmail.com>

To:data@innovatedatasearch.com

Hi Kelly!!

What can I possibly do for you today to get you to remove the website you have created posting false information about me? I'm happy you ar

Thanks!

As you see, there was no response from any party at InnovativeDataSearch, until she proceeded to serve the erroneous defamatory injunction which will be tossed.

www.callihisey.com

BBB of Delaware	
Complaint Hub: Business Complaints View Complaint Help Logout Complaint ID: #11898777	
WHAT IS THE NEXT STEP? BBB has determined your company has addressed the issues within the complaint; therefore we have closed this case in our files. There is no action for you to take at this time. We will contact you when we next require your input.	Date Filed: 12/27/2016 Business Information Business Name: Innovative Data Search LLC Address: Lewes, DE 19958 Phone: (888) 518-0888 Consumer Information Name: Ms. Calli L Hisey 300 E. 13th St. Address: Apartment 305 Vancouver, WA 98660 Daytime Phone: (360) 773-7460 Evening Phone: (360) 773-7460 Fax: (360) 773-7460 Email: hisey.calli@gmail.com
Complaint Details I emailed this corporation and asked them to remove me from their website www.bankruptreport.com. In return I got several threatening emails, threatening my bar license (I am an attorney) and to create a website. The company then created a website under my name defaming me as an attorney (www.callihisey.com). The company committed extortion in sending another email stating they would "discuss" removing the website if I gave up my legal rights to a lawsuit against them. This is illegal, and it is a scam. My reputation is my entire career and the website they have created will directly affect my ability to secure jobs, clients and my reputation around the community. The company is aware of the damaging effect of this website and is using this as a way to turn a profit. The website needs to be removed.	
Desired Outcome/Settlement Desired Settlement: Modification/discontinuance of an advertised claim Remove the website www.callihisey.com and remove my name and information from www.bankruptreport.com.	

EXHIBIT C